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To the County of San Diego:

The Cleveland National Forest appreciates the opportunity to comment on the potential impacts of the proposed General Plan Amendment for the former Forest Conservation Initiative (FCI) lands. The Forest's comments include comments previously submitted during the scoping period, on the basis of a meeting with San Diego County staff and review of the proposed land use maps, as well as comments on the recently released Draft Supplemental Environmental Impact Report (SEIR). We will begin by highlighting key issues and management challenges related to urbanization that were described in detail in our 2005 Forest Land Management Plan. These issues are common to all former FCI lands and are central to the potential environmental and public health and safety issues associated with increasing population density within and adjacent to the Cleveland National Forest. Next, issues particular to specific mapped areas of the plan are addressed. Finally, comments specific to the SEIR are addressed at the end of this letter.

Altogether, we are concerned about the potential environmental and public health and safety impacts that would be associated with increases in population density on former FCI lands, and we feel that these impacts are neither adequately disclosed in the Draft SEIR nor consistent with the objectives of the County of San Diego General Plan. Finally, we feel that the best way to protect both the environment and public health and safety on these lands would be to select the Modified Project Alternative along with a provision that buffer zones be set aside between private lands and the Cleveland National Forest.

Comments Addressing all FCI Lands

The rapidly increasing population of Southern California, the growing level of development adjacent to the Cleveland National Forest, and the resulting effects on the National Forest System (NFS) lands present some of our main management challenges. Higher density development in more remote areas leads to more Wildland/Urban Interface area that is at risk of and in need of protection from wildland fire. The combination of increased development and the need to protect these developed areas from fire and other natural events, such as flooding, will put increasing pressure on National Forest managers to alter landscape character to accommodate these uses. In the case of fire, suppression efforts to protect communities can lead to the buildup of fuels and eventually to higher severity, more damaging fires than would occur naturally.



Furthermore, increasing the number of homes in an area increases the likelihood of human-caused fires, which can increase fire frequency to levels that harm ecosystems, wildlife, and waterways. Finally, we have concerns about the potential difficulty of evacuating people from remote subdivisions when wildland fires occur nearby on the Cleveland National Forest.

Urban development also puts pressure on public lands to provide urban support facilities (i.e. infrastructure) through special-use authorizations as private land options for development are exhausted. In the past, subdivisions have been established with the expectation that adjacent National Forest land can accommodate necessary water tanks, utilities, and defensible space to protect homes from wildfire. Instead, we now request that private lands be required to serve these purposes for future subdivisions through the blanket incorporation of buffer zones for new development projects on FCI lands. Along the same lines, where water delivery systems are not in place, the installation of wells for household use will lower the groundwater table beneath adjacent NFS lands, thereby degrading habitats for native plant and animal species. To avoid these impacts, we request that water delivery systems be established before enabling increased density on former FCI lands.

Road access presents several primary issues associated with increasing population density within or adjacent to the National Forest. The narrow, winding National Forest road system was built in the 1930s to support fire protection and does not meet typical County access standards. Moreover, the greater the population density of an area, the wider a suitable road would need to be. The National Forest roads generally lack rights-of-way where they cross private lands, which would need to be obtained in order to widen them or convey utilities. Furthermore, any improvements to Forest or County roads on the National Forest would require substantial planning and environmental compliance to be borne by project proponents, if permitted. Widening roads, building new roads, and increasing traffic to accommodate increasing population density in remote County areas would negatively impact plants and animals in a variety of ways, including direct mortality and habitat loss and fragmentation, and would also increase erosion and sedimentation of waterways.

Increased interface between developed private lands and National Forest boundaries also increases boundary management challenges including addressing occupancy trespass, clearly posting boundaries, and retaining clear title to NFS land. For example, in re-marking forest boundary after the 2007 fires, we discovered major encroachments adjacent to some subdivisions.

Another challenge associated with urbanization is the complex problem of National Forest access. For example, traditional points of public and administrative access to the National Forest have been lost as private land is subdivided. New landowners are often reluctant to accommodate access across their land. At the same time, residents living adjacent to the National Forests want convenient access, often resulting in the development of unplanned roads and trails. Unauthorized motorized vehicle use occurs and tends to be more of a management challenge on National Forest lands near private developments. As an example, illegal motor vehicle use of the Pacific Crest Trail has been reported from the Lake Morena area in the midst of the federally designated Hauser Wilderness.

Population growth within and surrounding the National Forests will probably be the single largest impact on National Forest recreation management in the foreseeable future. This growth has pushed urban development closer to and within the National Forest, in some cases directly adjacent to National Forest boundaries. Where NFS lands are or will be the boundary to this development, there will be pressure on these adjacent lands to provide diverse kinds of recreation. Higher density development would be expected to increase this pressure. Recreation on the National Forest is managed according to Recreation Opportunity Spectrum (ROS) to provide choices for people to recreate in settings that vary from urban to primitive. In general, the Forest Service would prefer zoning on adjacent private lands to be complementary with the land use zone and ROS on the NFS land. For example, where there is interface between private lands and NFS lands within a designated wilderness area or Inventoried Roadless Area, lower density County zoning would be the more complementary. Solitude, an increasingly rare opportunity, is a desirable feature in wilderness, but would be difficult or impossible to retain in the face of the increasing population and high density development.

Extensive habitat conservation planning efforts led by local government and conservation organizations have identified the need to maintain an inter-connected network of undeveloped areas or landscape linkages, which retain specific habitats and allow for maintenance of biodiversity and wildlife movement across the landscape and led to development of several multi-species habitat conservation plans. National Forest System lands are a core element of this natural open space network and will play an increasingly important role as additional habitat fragmentation occurs on surrounding private lands. Fragmentation is the breaking up of contiguous blocks of habitat by urban development features into progressively smaller patches that are increasingly isolated from one another and of less value for conservation. Higher density zoning allows for a higher level of development and, accordingly, fragmentation. Habitat loss and fragmentation are the leading causes of species extinctions, and the Cleveland National Forest has many populations of federally-listed threatened and endangered species that could be affected by increasing population density on former FCI lands. Meanwhile, invasive species generally enter new areas through human activity in those areas, and so increasing population density would result in the introduction of new infestations that would damage Forest resources and be costly to manage.

Comments Specific to Particular Locations

- **Alpine Community Planning Area (CPA).** The Forest is concerned about the density increases proposed for areas at the eastern end of Alpine, both south and north of Interstate 8. Road and water systems should be planned before enabling such increases, and the severe risk of fires starting along the freeway corridor and blowing westward into these areas should be addressed. In addition, Viejas Mountain was designated a Critical Biological Area of the National Forest by our Land Management Plan due to its unique botanical resources. The dense developments proposed for its perimeter and northeast of the Viejas Reservation, shown in yellow (SR-1) on the proposed maps, would be unlikely to effectively buffer this sensitive area from the impacts of residential development. This zoning also appears to be inconsistent with similar areas on the west side of Viejas Mountain, which are designated as RL-40. For the parcels that were re-designated as RL-

20 since the last maps were made available, we would prefer that the RL-40 designation be retained instead to prevent the environmental and public health and safety impacts described above.

- **Jamul CPA – Skye Valley Ranch.** The Forest would recommend continuing the RL-80 zoning on these parcels. The bridge over Pine Creek near Barrett Honor Camp is insufficient for any traffic, even in an emergency, and will not be improved or replaced since it falls within the Pine Creek Wilderness. Additionally, these parcels border two existing federally designated wilderness areas (Pine Creek Wilderness and Hauser Wilderness) and are completely surrounded by NFS lands. Further improvement of infrastructure to this area, such as utilities and road access, required for a smaller lot size zoning would have a negative impact on wilderness values, increase the need for fuels treatments, and raise potential for the issues and impacts described above.
- **Areas west of Cuyamaca CPA.** The Forest supports RL-80 zoning for parcels adjacent to the Cuyamaca CPA along Boulder Creek Road. These parcels are located in a very undeveloped and fire prone part of the Cleveland National Forest and are adjacent to Inventoried Roadless Areas (IRAs) that are proposed for recommended wilderness status in the Southern California National Forests Land Management Plan Amendment project.
- **Descanso CPA.** The Forest supports the mix of zoning as mapped for the Descanso planning area and encourages the County to retain the lower density RL-80 zoning that is currently proposed. The northern part of the Descanso CPA abuts two IRAs (Sill Hill and No Name) that are proposed for recommended wilderness status in the Southern California National Forests Land Management Plan Amendment project. Also adjacent to the north Descanso CPA is the King Creek Research Natural Area, which contains a rare population of Cuyamaca cypress, a Forest Service sensitive species. All of the King Creek stands burned in a fire in 1950 and most of the area re-burned in the 2003 Cedar Fire. Post-Cedar Fire regeneration is expected to be adequate to repopulate the stands because trees were old enough to have substantial cone banks at the time of the fire; however, it is important to protect the stand from overly frequent fire especially at this vulnerable time. For these reasons, the Forest supports a minimum of RL-40 adjacent to these IRAs and research natural area on the NFS land.
- **Pine Valley CPA.** The Forest supports the current extent of RL-80 zoning proposed for the Pine Valley CPA in the Draft Land Use Plan. This area contains many of the highest recreational and scenic values to be found on the Cleveland National Forest. Parcels in this CPA south of Interstate 8 are directly adjacent to the federally designated Pine Creek Wilderness. Parcels along Sunrise Highway are adjacent to the Mount Laguna National Recreation Area. The Forest also supports maintaining the proposed RL-40 zoning adjacent to Buckman Springs Road because the NFS land to the east is zoned as Back Country Non-Motorized, which is the most restrictive zoning other than recommended

wilderness and designated wilderness. In addition, the Pacific Crest Trail, a 2,650-mile national scenic trail that runs from Mexico to Canada through California, Oregon and Washington, traverses this area before moving onto the National Forest. The low density proposed would help maintain the recreational and scenic values.

- **Central Mountain CPA.** We recommend RL-80 zoning for parcels in the Central Mountain CPA where RL-40 zoning in the adjacent Julian CPA was extended into parcels within the Cleveland National Forest. This recommendation affects two contiguous parcels that are adjacent to the Upper San Diego River Canyon. The Upper San Diego River is an area of rugged topography and high fire danger. In addition, this undeveloped area is proposed for recommended wilderness status in the Southern California National Forests Land Management Plan Amendment project.
- **Pendleton – De Luz CPA.** The Forest recommends reducing the allowable density to RL-80 for RL-40 in areas surrounded by NFS lands in the Pendleton - De Luz CPA. These parcels are directly adjacent to the federally designated San Mateo Canyon Wilderness area. The parcels on Miller Mountain contain unique botanical resources and would require major road improvements across NFS lands if developed.
- **North Mountain CPAs.** The Forest supports the current extent of RL-80 zoning in the North Mountain CPA and encourages the county to retain this zoning through the planning process. We are uncertain of the proposed density for the triangular parcel on the north side of Warner Springs, which abuts the Caliente Inventoried Roadless Area proposed for wilderness designation in the Southern California National Forests Land Management Plan Amendment project. Reducing the density for this parcel to the RL-80 zoning would better buffer the proposed recommended wilderness area from adjacent land uses.

Comments on the Draft Supplemental Environmental Impact Report

The Draft SEIR should clearly make the case that the objectives presented in Chapter 1.3, as drawn from the County of San Diego General Plan, are met by the proposed project. In our view, the document fails to demonstrate that the proposed project meets the majority of the objectives and instead includes evidence that objectives will not be met. Other than stakeholder participation, the only objective that the proposed project could meet is the first one listed – “Support a reasonable share of projected regional population growth;” – and we feel that it fails to meet even this objective, because the failure to meet the remainder of the objectives renders the share of growth unreasonable. The proposed project clearly conflicts with 6 of the 10 objectives, as the rationale beneath each objective below demonstrates:

- Promote sustainability by locating new development near existing infrastructure, services, and jobs.

- Remote parcels within and adjacent to the Cleveland National Forest are far from infrastructure, services, and jobs.
- Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
 - Increased development on remote parcels within and adjacent to the Cleveland National Forest threatens many of the natural resources and habitats that uniquely define the County's character and ecological importance.
- Ensure that development accounts for physical constraints and the natural hazards of the land.
 - Remote parcels within and adjacent to the Cleveland National Forest experience severe risk of wildland fire incursion.
- Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.
 - Remote parcels within and adjacent to the Cleveland National Forest are accessible only by passenger vehicle and road access is substandard for general residential use.
- Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
 - Remote parcels within and adjacent to the Cleveland National Forest would not be environmentally sustainable for numerous reasons cited throughout this letter, and the development and access would increase greenhouse gas emissions that contribute to climate change.
- Minimize public costs of infrastructure and services and correlate their timing with new development.
 - Remote parcels within and adjacent to the Cleveland National Forest would maximize public costs of infrastructure and services.

The assumption is made throughout the analysis of potential impacts that "regulations, implementation programs, and mitigation measures from the General Plan Update EIR" will result in impacts that fall below the threshold of significance. This assumption is flawed in that it fails to recognize the irretrievable losses to natural and cultural resources involved when subdividing new areas of an already densely populated region. The Draft SEIR presents numerous plans and projects considered in evaluating cumulative impacts, but it fails to include the impacts of the past development of San Diego County, as represented by the existing condition of the region. When viewed through this lens, further increases of population density in remote areas of the County will necessarily have significant impacts, regardless of "regulations, implementation programs, and mitigation measures." The scope of the cumulative impacts section needs to be broadened to include development that has occurred up to the current time.

While the Draft SEIR considers many topics, it fails to offer the level of detail that would be needed to evaluate the environmental impacts of its alternatives. We feel that as a result of the vague nature of the analysis presented, environmental and public health and safety impacts have

not been sufficiently analyzed or disclosed. Examples of these deficiencies are provided below by topic.

Biological Resources

With regard to description of the impacts of the FCI Lands project on biological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts on general plant and wildlife species. These are assumed to be significant and unavoidable for special status species, riparian habitat, and wildlife movement corridors (Table S-2). However, there is no identification of effects on individual species even though the project will adversely affect or is likely to adversely affect a number of federally-listed species including Arroyo Toad, California Gnatcatcher, and San Diego Thornmint as well as candidate species for listing such as Hermes Copper butterfly. The proposed alternatives will also adversely affect many of our Regional Forester's list of Sensitive Species through direct mortality and habitat loss and fragmentation, creating difficulties for conserving their populations on NFS lands. The blanket approach taken by the Draft SEIR does not adequately describe and disclose effects on these species, effectively leaving this analysis to later piecemeal analyses that will be done for individual projects. This does not allow for meaningful protection and conservation of these species across broader areas. This is not consistent with the purpose and intent of CEQA.

Given the lack of detail in the SEIR, it is not possible to perform a meaningful comparison of the effects of the different alternatives. The analysis does not provide enough information to determine which alternative would best conserve key resources.

Cultural and Paleontological Resources

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR address the issues to be resolved, which includes the choices among alternatives and whether or how to mitigate significant impacts. As stated in the Draft FCI Lands SEIR, the major issues to be resolved regarding the project include decisions by the Lead Agency as to whether or not the Draft SEIR adequately describes the environmental impacts, whether the recommended mitigation measures identified for the proposed Project should be adopted or modified, or if additional mitigation measures should be required.

In regard to adequate description of the impacts of the FCI Lands project on historic or archaeological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts, which are assumed in advance to be less than significant through the implementation of various policies and mitigation measures contained in the General Plan Update.

Table S-2, "Summary of Project Impacts" and various sections of the Draft FCI Lands SEIR contain information indicating that implementation of the Proposed Project would result in new development that would have the potential to result in substantial adverse changes to the

significance of historical resources and cause a substantial adverse change in the significance of archaeological resources, including the destruction or disturbance of archaeological sites that contain or have the potential to contain information important to history or prehistory. However, with the application of various policies and mitigation measures, impacts to historic and archaeological resources are assumed to be "less than significant." It is unclear from the analysis that cultural resources will actually be protected by such policies and measures to the extent that they would not be significantly affected by the Proposed Project.

In Section 2.5 "Cultural Resources" of Table S-3 and various other sections of the Draft SEIR contain information indicating that the "Modified Project" alternative is likely to result in less impacts to historical and archaeological resources when compared to Proposed Project, and that implementation of the "No Project" alternative is likely to result in greater impacts when compared to the Proposed Project. However, under the mitigation process proposed in the Draft SEIR, impacts to historic and archaeological resources would be "less than significant" with the implementation of mitigation measures for the Proposed, Modified, and No Action alternatives. This assumption is based on the assumption in advance that historic and archaeological resources are distributed evenly throughout the FCI lands. Depending on the actual distribution of these resources within the FCI lands, the differences in potential impacts between the implementation of the Proposed, Modified, and No Action alternatives could be substantially different than those assumed in the Draft SEIR. The only real difference between the implementation of any one of these three scenarios would be the potential for significant impacts, not actual impacts, assuming the implementation of policies and mitigation measures always result in "less than significant" impacts. As a result, the comparison of these three scenarios is of no actual quantitative or qualitative value for the purposes of identifying an "Environmentally Superior" course of action.

Page 12 of the "County Cultural Guidelines" states that "Determining what is an important cultural resource worth preserving [sic] is a subjective and interpretive process; therefore, it is useful to utilize a standard assessment approach to evaluate cultural resources. In order to evaluate cultural resources, a comprehensive assessment must be conducted, including measuring the resource against the State CEQA Guidelines provisions and criteria established by the National Register of Historic Places, the California Register of Historical Resources, and the San Diego County Local Register of Historical Resources, and the Resource Protection Ordinance as well as assessing the integrity of the resource." Without any actual assessment or evaluation of historic and archaeological resources within the FCI Lands project area, there is no quantitative or qualitative basis for comparing the various courses of action, selecting an "Environmentally Superior" alternative, determining whether the recommended mitigation measures identified for the proposed Project should be adopted or modified, or determining if additional mitigation measures should be required for this project, as the Draft FCI Lands SEIR does not adequately describe the impacts of the Proposed Project on historic and archaeological resources.

Hazards and Hazardous Materials

The section that deals with Wildland Fire (2.6.3.7) concludes that the Proposed Project would have significant impacts related to wildland fire, while suggesting that regulations, implementation programs, and mitigation measures would reduce those impacts. In the

Mitigation Measures section (2.6.4.7), several mitigation measures are deemed infeasible that would dramatically reduce losses of homes and lives through restricting development in areas with more than a moderate fire hazard or requiring extensive fuel modification around development. Instead, the analysis determines that "one of the primary objectives of the project which is to accommodate a reasonable amount of growth" renders these mitigation measures infeasible. Apart from the fact that this conclusion disregards the remainder of project objectives, it also suggests that it is more valuable to allow growth in high and very high fire hazard areas than to protect those homes and people from the very hazards that the mitigation measures were designed to prevent. The end result of increasing population density on the former FCI lands will be greater losses of lives and property to recurrent wildland fire.

On a related note, the sections that Deal with Emergency Response and Evacuation Plans (2.6.3.6 and 2.6.4.6) conclude that significant impacts will be avoided through regulations, implementation programs, and mitigation measures. Three of the four measures presented, however, do not reflect the reality of the roads that would provide access to many of the FCI lands. These roads generally lack an interconnected road network, multiple ingress and egress routes, and suitability for use as rural roads serving residential subdivisions. The hazards of unsuitable escape routes resulting from these conditions along with the above-mentioned permission to develop in areas with high to very high fire hazards makes the likelihood even greater that implementation of the proposed project would lead to tragic losses of life and property.

Land Use

Given that the FCI lands are by definition in close proximity to the Cleveland National Forest, it is surprising to find no mention of our Land Management Plan in Section 2.8.3.2, which considers "Conflicts with Land Use Plans, Policies, and Regulations." As described in the beginning of this letter, increasing population density on FCI Lands would lead to numerous environmental and public health and safety issues on the Cleveland National Forest, as described in our 2005 Land Management Plan, and would accelerate problems that our Plan directs us to remedy. As a result, we call into question the determination that project impacts with regard to land use plans, policies, or regulations would be below a level of significance. The conflict of this project with our Land Management Plan should be investigated and disclosed as part of this analysis.

Nowhere is the disconnect between this project and our Land Management Plan greater than where the FCI lands are adjacent to or within designated or recommended wilderness areas. There is no mention of designated or recommended wilderness on the Cleveland National Forest or other federal lands managed by the Department of Interior. As such, there is no basis provided for evaluating the potential for the project to impact wilderness areas adjacent to FCI Lands. Potential project impacts on the wilderness resource could be significant and unavoidable, although it is not possible to perform a meaningful comparison of the effects of the different alternatives due to the lack of mention of wilderness in the Draft SEIR.

Section 2(c) of the Wilderness Act of 1964 (Public Law 88-577) defines wilderness: "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is

hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation..."

In summary, the key elements of wilderness include its natural state (biological and other natural processes operating unimpaired, uninhibited, and unchanged by humans), opportunities for solitude and primitive recreation opportunities, undeveloped character, and untrammelled (unmanaged) nature.

Increased density and development near or adjacent to designated or recommended wilderness areas would likely adversely affect the wilderness resource in a number of ways. Increased population in the County, particularly in rural areas, may result in increased use of wilderness, therefore impacting opportunities for solitude and primitive recreation opportunities. The visual impact of subdivisions on the wilderness user is also due consideration. Development in the vicinity of wilderness increases the likelihood that non-native, invasive species would be introduced into wilderness, thereby disrupting natural processes within the wilderness. Development upstream within watersheds shared by wilderness increases the likelihood of impaired water quality or decreased stream flows in wilderness due to runoff, impoundments, and/or groundwater use. Similarly, development adjacent to wilderness increases the likelihood that landowners build trespass structures, roads, or trails in wilderness, or use motorized or mechanized equipment in wilderness, thereby impacting its undeveloped character. Finally, increased development and density near wilderness increases the likelihood that fire management activities would impact the wilderness resource during wildfire events, which impacts the natural and untrammelled characteristics of wilderness.

Recreation

While the SEIR presents a very broad analysis of the effects of the project on recreation facilities, it does not contain any discussion or analysis of recreation activities in undeveloped, backcountry areas accessed by trail or cross-country travel. Increased recreation in undeveloped, backcountry areas can have substantial adverse effects on the environment, including litter, graffiti, impaired water quality, erosion, increased risk of wildfire, and various impacts to vegetation, wildlife, and cultural resources.

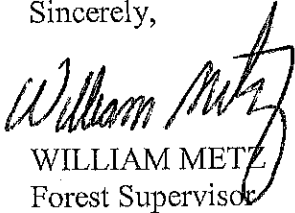
Increased population in the County would likely lead to an increase in recreation in both developed facilities and undeveloped, backcountry areas. While this increased use could have beneficial recreational impacts, the SEIR should include an analysis of environmental impacts that result from recreation in undeveloped backcountry areas, as it does for developed facilities.

Conclusion

We appreciate the development and consideration of the Modified Project (Environmentally Superior) Alternative as described in Chapter 4.3. The sacrifice of less than 10% of the residential dwelling units of the proposed project would certainly be worth the resultant protection of resource conditions and reduction of wildfire risk to communities. Moreover, the areas where the lower densities would be located, as specified in the Modified Project Alternative, are precisely the areas where resource and wildfire concerns are greatest. As a result, we strongly support the adoption of the Modified Project Alternative rather than the Proposed Project. In addition, we encourage the County to set aside buffer zones between private and NFS lands to protect the environment and public health and safety and reduce conflict between adjacent land uses.

To conclude, we appreciate the consideration that you have given to our past concerns about this project and hope that you give similar consideration to our concerns about the Draft SEIR. We are very interested in working with the County of San Diego to achieve the objectives of the project that address environmental sustainability and risk avoidance. Thank you for the opportunity to comment on the potential impacts of the proposed project for the former FCI lands in the unincorporated areas of San Diego County. If you have any questions about these comments, please contact Jeff Heys, Forest Planner, at (858) 674-2959.

Sincerely,



WILLIAM METZ
Forest Supervisor

cc: Gloria Silva